



NEW YORK
REGIONAL OFFICE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

May 27, 2021

By ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,
12-CV-6421 (KMK)

Dear Judge Karas:

I write to oppose the requests of Dr. Stuart Krost and Chelsea Krost to either adjourn or be excused from the June 3 Hearing in *SEC v. Bronson*. DE 247. As background, the Court ordered these witnesses to appear at the hearing. DE 245. They are relevant to Bronson's compliance with the Court's January 19, 2021 Order holding Bronson in contempt. DE 223. The Commission detailed the reasons for these witnesses to appear in a letter dated May 19. DE 242. Essentially, the Commission expects that both witnesses will be able to address aspects of Bronson's business transactions and compensation.

While Commission counsel understands Ms. Krost's inability to travel, counsel has not stated that she is unavailable by telephone or video for the June 3 Hearing, if such an accommodation is possible. It is hard to see how Dr. Krost's general excuse, that he has patients to see, will ever be unavailable to him. As explained in the Commission's May 19 letter, Commission counsel has unsuccessfully sought deposition dates from counsel for Dr. Krost and Chelsea Krost many times. *See*, DE 242, Exhibit J (compilation of email requests). Thus, the request to adjourn or be excused from the hearing seems like yet another undue delay by at least Dr. Stuart Krost.

For these reasons, the Commission requests that Dr. Stuart Krost appear and, if she is available, Ms. Krost appear telephonically or by video (if possible).

Very truly yours,

s/ Maureen Peyton King

Maureen Peyton King
Senior Trial Counsel